

## \*\* SECTION 362 INFORMATION SHEET \*\*

Ronald Adams and Liping Adams  
DEBTOR

Chapter 7  
Case No.: 10-13759-lbr

Wilmington Trust Company, as successor to JPMorgan Chase Bank, National Association, as Trustee for the C-Bass Mortgage Loan Asset-Backed Certificates, Series 2006-CB3

MOVANT

PROPERTY INVOLVED IN THIS MOTION: 817 Dawn Valley Drive , North Las Vegas NV 89031

NOTICE SERVED ON: Debtor(s)        x       ; Debtor (s) Counsel        x       ; Trustee        x       

### MOVING PARTY'S CONTENTIONS:

### The EXTENT and PRIORITY of LIENS:

1<sup>st</sup> Wilmington Trust Company, as successor to JPMorgan Chase Bank, National Association, as Trustee for the C-Bass Mortgage Loan Asset-Backed Certificates, Series 2006-CB3  
\$295,678.22 (PB)

Other: Clark County Treasure \$1,000.00

Other: Internal Revenue Service \$40,000.00

Total Encumbrances: \$336,678.22

APPRAISAL or OPINION as to VALUE:  
"Per attached Schedule "A" \$138,067.00

TERMS OF MOVANT'S CONTRACT  
WITH THE DEBTOR

Amount of Note: \$290,400.00  
Interest Rate: 5.0899999999999999  
Duration: 30 Year  
Payment Per Month: \$ 1,953.97  
Date of Default: February 1, 2009  
Amount of Arrearages:  
3 Monthly Payments at \$2,028.53 \$6,085.59  
(April 1, 2010 - June 1, 2010)  
Motion for Relief Filing Fee \$150.00  
Attorneys Fees \$750.00  
Total \$6,985.59

Date of Notice of Default: May 6, 2009

**SPECIAL CIRCUMSTANCES:** I, Gregory L. Wilde, hereby certify that an attempt has been made to confer with debtor(s) counsel, or with debtor(s) and that more than two (2) business days have expired, and that after sincere effort to do so, counsel has been unable to resolve this matter without court action.

SUBMITTED BY

SIGNATURE:

**DEBTOR'S CONTENTIONS:**

### The EXTENT and PRIORITY of LIENS:

1<sup>st</sup> \_\_\_\_\_2<sup>nd</sup> \_\_\_\_\_

Total Encumbrances: \$ 336,678<sup>02</sup>

APPRAISAL or OPINION as to VALUE:

## OFFER OF "ADEQUATE

PROTECTION" FOR MOVANT:

Pay Aug 1 payment funds,  
Pay arrears over 6  
months start 8/20/10

**SPECIAL CIRCUMSTANCES:**

SUBMITTED BY:

**SIGNATURE:**

NEWARK & NEWARK LAW FIRM  
RICHARD C. NEWARK, ESQ.  
Nevada Bar #002763  
NARRAH F. NEWARK, ESQ.  
Nevada Bar #008201  
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E-mail: BK@nnbklaw.com  
Attorneys for Debtor(s)

E-Filed on June 30, 2010

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:	)	Chapter 13
	)	Case No. 10-13759-lbr
<b>RONALD ADAMS</b>	)	
<b>LIPING ADAMS</b>	)	
	)	
Debtor(s).	)	DATE: 7/28/2010
	)	TIME: 10:30 a.m.

**OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW, the Debtors, RONALD ADAMS and LIPING ADAMS, by and through their attorneys, NARRAH F. NEWARK of NEWARK & NEWARK LAW FIRM, and respectfully request this Court to deny the MOTION FOR RELIEF FROM THE AUTOMATIC STAY filed by WILMINGTON TRUST COMPANY, by and through its attorneys, GREGORY L. WILDE of WILDE & ASSOCIATES and TIFFANY & BOSCO.

**POINTS AND AUTHORITIES**

11 USC Section 362 (d) (1) states that the Court may terminate, modify or condition stay

"for cause, including the lack of adequate protection of an interest in property of such party in interest;---

11 USC Section 362 (d) (2) the Court may terminate, modify or condition a stay

"with respect to a stay of an act against property under subsection (a) of this section, if-

(A) the debtor does not have an equity in such property AND

(B) such property is not necessary to an effective reorganization

**STATEMENT OF FACTS**

Debtors' property has liens of approximately \$336,678.22 for the property located at 817 Dawn Valley Drive, N Las Vegas, NV 89031, and the home is necessary for an effective reorganization. Debtors believe that they may have minimal equity in the property.

11 USC Section 362 (d) (1) may apply as:

1. Debtors acknowledge that if they are late on the post petition mortgage payments, they will need some time to acquire the necessary funds to cure all post-petition arrearages.

2. Debtors wish to cure the arrearages through an Adequate Protection Order.

3. Debtors' intention is to stay current on future post-petition mortgage payments.

THEREFORE, Debtors request that the motion filed be denied under 11 USC Section (d) (1) or (2), and that any action on creditor's behalf be stayed for an adequate amount of time to allow Debtors to become current on the post petition mortgage arrearages, if necessary, and/or to Stipulate to an Order Re Adequate Protection.

Respectfully submitted:

NEWARK & NEWARK

By: /s/ NARRAH F. NEWARK  
NARRAH F. NEWARK, ESQ.  
NB#008201  
Attorney for Debtor(s)

**CERTIFICATE OF MAILING OF OPPOSITION TO MOTION  
FOR RELIEF FROM AUTOMATIC STAY**

I hereby certify that on June 30, 2010, I faxed and mailed a true and correct copy by facsimile and by first class mail, postage prepaid, to the below named the  
OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY:

Wilmington  
c/o Greg Wilde, Esq.  
Wilde & Associates  
208 S. Jones  
Las Vegas, NV 89107  
**VIA ECF**

Kathleen leavitt, Trustee  
201 Las Vegas Blvd., S., #200  
Las Vegas, NV 89101  
**VIA ECF**

Ronald & Liping Adams  
817 Dawn Valley Dr.  
North Las Vegas, NV 89031

/s/ Betsy L. Smith  
An employee of NEWARK & NEWARK LAW FIRM